

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

UNITED STATES OF AMERICA)	
)	CASE NO. 3:11-CR-43
v.)	
)	JUDGE PHILLIPS
JOEL CHRISTIAN PARKER)	

UNITED STATES' SENTENCING MEMORANDUM

The United States of America, by and through Nancy Stallard Harr, Acting United States Attorney for the Eastern District of Tennessee, hereby states that it has no additional information regarding the issue of sentencing, apart from the information contained in the Presentence Investigation Report and in the Plea Agreement (Doc. 21).

In the Plea Agreement, both parties agreed that, pursuant to Rule 11(c)(1)(C) of the Federal Rules of Criminal Procedure, an appropriate sentence in this case is a total of 240 months of imprisonment and 5 years of supervised release. (Doc. 21, Plea Agreement, 6.) That sentence consists of 156 months as to Counts One and Three and 120 months as to Count Five, to run concurrently with each other, and 84 months as to Count Four, to run consecutively to the other sentences, for a total effective sentence of 240 months. *Id.* A sentence of imprisonment for 240 months is reasonable when applying the factors set forth in Title 18, United States Code, Section 3553(a), to the circumstances of this case. At this time, the United States submits that the agreed upon sentence of 240 months' imprisonment is an appropriate sentence. However, the United

States reserves the right to offer argument and proof at the sentencing hearing as it deems appropriate and as the Court permits.

Respectfully submitted this 5th day of March, 2012.

NANCY STALLARD HARR
ACTING UNITED STATES ATTORNEY

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CERTIFICATE OF SERVICE

I hereby certify that, on March 5, 2012, a copy of the foregoing was filed electronically. Notice of the filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

s/ *Melissa M. Kirby*
Melissa M. Kirby
Assistant United States Attorney